

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NIGEL HARRIS,	:	ECF
	:	
Plaintiff,	:	06 CV 2864 (RMB)
	:	
-against-	:	<u>INITIAL DISCLOSURES</u>
	:	
JP MORGAN CHASE & CO.,	:	
	:	
Defendant.	:	
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Pursuant to the required disclosure provision of Federal Rule of Civil Procedure 26(a), Defendant J.P. Morgan Chase & Co. ("JPMC") makes the following required disclosures:

A. Identities of Individuals

JPMC believes that the following individuals have knowledge relevant to the disputed facts:

<u>Name</u>	<u>Address</u>
Ahsan Zaman	c/o J.P. Morgan Chase Legal Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-2569
Debra Juntunen	c/o J.P. Morgan Chase Legal Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-2569
Nigel Harris	190 West Merrick Road, #3C Freeport, New York 11520 (516) 410-5884

B. Documents

Without waiving any objections to admissibility and relevancy, pursuant to Rule 26(a)(1)(B), Defendant identifies the following documents and/or categories of documents which are in its possession:

1. Plaintiff's personnel file;
2. Portions of JPMorganChase & Co.'s employee handbook(s) and/or employee on-line manual.

C. The provisions of FRCP 26(a)(1)(C) are not applicable because JPMC is not seeking damages at this time from Plaintiff.

D. JPMC is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement its response as appropriate.

Defendant reserves the right to supplement or amend these disclosures should other, different, or additional information become known to it.

Dated: New York, New York  
November 20, 2006

JPMORGAN CHASE LEGAL DEPARTMENT

By: 

Talee Zur (Potter) (TZ/4342)  
1 Chase Manhattan Plaza, 26th Floor  
New York, New York 10081  
(212) 552-2569  
Attorney(s) for Defendant

To: Nigel Harris, *Pro Se* Plaintiff  
190 West Merrick Road, #3C  
Freeport, New York 11520  
(516) 410-5884

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NIGEL HARRIS,

ECF

Plaintiff,

:  
06 CV 2864 (RMB)

-against-

:  
AFFIDAVIT OF SERVICE

J.P. MORGAN CHASE BANK,

Defendant.  
----- X

STATE OF NEW YORK )

) ss.:

COUNTY OF NEW YORK )

Vivian Patricia Falconi, being duly sworn, deposes and says, that deponent is not a party to the action, is over eighteen years of age and is employed by J.P. Morgan Chase Bank and that on the 20<sup>th</sup> day of November, 2006, deponent served the within

INITIAL DISCLOSURES

Upon: Nigel Harris

Pro Se

190 West Merrick Road, Apt. #3C

Freeport New York 11520

(516) 410-5884

at the address designated for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

Vivian Patricia Falconi

Sworn to before me this

20<sup>th</sup> day of November 2006

Susan McNamara

Notary Public

SUSAN McNAMARA  
Notary Public, State of New York  
No. 43-4836571  
Qualified in Richmond County  
Certificate Filed in New York County  
Commission Expires July 31, 2009